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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR 19-00046 BLF
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	SETTING HEARING DATE AND EXCLUDING
v.	)	TIME FROM THE SPEEDY TRIAL ACT
	)	CALCULATION
YVONNE LATTIMORE,	)	
	)	
Defendant.	)	

The defendant, YVONNE LATTIMORE, represented by David Plotsky, and the government, represented by Christopher Vieira, Special Assistant United States Attorney, appeared before the Court on April 13, 2021 for a status conference. Defense counsel represented that additional time was needed for attorney preparation.

The Court set a status conference for September 28, 2021 at 9:00 a.m., a motions hearing for January 20, 2022 at 1:30 p.m., a pretrial conference for April 7, 2022 at 1:30 p.m., and the start of trial for May 16, 2022. Defendant requested that time be excluded under the Speedy Trial Act between April 13, 2021 and May 16, 2022 to conduct necessary investigation and to review discovery. The government did not object to the request to exclude time.

STIPULATION AND [PROPOSED] ORDER  
CR 19-00046 BLF

Therefore, the parties agree, and the Court finds and holds, as follows:

1. This matter is set before this Court for a status conference on September 28, 2021, a motions hearing on January 20, 2022, a pretrial conference on April 7, 2022, and the start of trial on May 16, 2022.

2. The time between April 13, 2021 and May 16, 2022 is excluded under the Speedy Trial Act. Failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial and in the prompt disposition of criminal cases. *See id.* § 3161(h)(7)(A).

Dated: 4/20/2021

/s/ David Plotsky

DAVID PLOTSKY  
Counsel for Defendant

Dated: 4/20/2021

/s/ Christopher Vieira

CHRISTOPHER VIEIRA  
Special Assistant United States Attorney

IT IS SO ORDERED.

Dated: April 21, 2021



BETH LABSON FREEMAN  
United States District Judge